

EXHIBIT B

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)

)
)
Plaintiff,)

)
)
vs.) Case No.:

) 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.,)

OTTOMOTTO LLC; OTTO TRUCKING)

LLC,)

)
)
Defendants.)

ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF JAMES HASLIM
San Francisco, California
Tuesday, April 18, 2017
Volume 1

Reported by:

RACHEL FERRIER, CSR No. 6948

Job No. 2597892

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1 MR. KIM: Objection; form. 10:41:07

2 THE WITNESS: That's my understanding. 10:41:08

3 BY MR. JAFFE: 10:41:09

4 Q Okay. How much are the diodes [REDACTED] [REDACTED]

5 [REDACTED] 10:41:17

6 A I'm not sure I know the number. 10:41:18

7 Q Is it [REDACTED] 10:41:22

8 A I wouldn't be surprised if it was [REDACTED] [REDACTED]

9 [REDACTED] 10:41:26

10 Q Okay. And to go back to my earlier question, the 10:41:27

11 Fuji design, in total, has [REDACTED] [REDACTED]

12 [REDACTED]; right? 10:41:37

13 MR. KIM: Objection; form. 10:41:39

14 THE WITNESS: That is the current design. 10:41:40

15 BY MR. JAFFE: 10:41:48

16 Q Okay. How are the diodes aligned with respect 10:41:49

17 to -- for manufacturing purposes with respect to each 10:41:54

18 other? 10:42:00

19 MR. KIM: Objection; form. 10:42:01

20 THE WITNESS: [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] 10:42:11

23 BY MR. JAFFE: 10:42:14

24 Q And there's a -- you provide an X/Y coordinates 10:42:15

25 to the manufacturer; right, for each of the laser 10:42:18

1 diodes? 10:42:20

2 A Yes. 10:42:21

3 Q And what are the X/Y coordinates mapped to? 10:42:21

4 A They are referenced to fiducial marks on the PCB. 10:42:25

5 Q And have you ever used holes for those? 10:42:30

6 A Sorry? 10:42:35

7 Q For the fiducials, have you ever used a hole as a 10:42:36

8 fiducial? 10:42:42

9 A No. We have always placed the laser diodes using 10:42:43

10 the metal fiducial marks on the PCB. 10:42:46

11 Q And who came up with that idea? 10:42:48

12 MR. KIM: Objection; form. 10:42:50

13 THE WITNESS: I believe it's standard practice in 10:42:51

14 PCB manufacture. 10:42:54

15 BY MR. JAFFE: 10:42:56

16 Q So who came up with using it for Fuji? 10:42:56

17 A I don't know. 10:42:58

18 Q Okay. When did that design come up? 10:42:59

19 A I don't remember the exact date, but I think you 10:43:03

20 suggested there was a certain time frame. Did you say 10:43:09

21 December when boards went out? It would be in that 10:43:11

22 approximate time frame. 10:43:17

23 Q Well, just to be clear, I'm looking to your 10:43:17

24 testimony about this -- 10:43:20

25 A I understand. 10:43:20

1 there? 11:16:19

2 A Oh, if I had him face-to-face, I would have 11:16:19

3 recounted the sequence of events and -- [REDACTED] [REDACTED]

4 [REDACTED] 11:16:24

5 Q And what transpired? 11:16:27

6 A Oh, it would help to go back, but, basically, I'm 11:16:29

7 announcing to my team that we are making a major pivot 11:16:35

8 in our design approach. [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] 11:16:50

12 Q And what happened? 11:16:51

13 A [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] 11:17:15

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED] [REDACTED]

23 [REDACTED] 11:17:29

24 A Yes. 11:17:31

25 Q And then did you tell him, "We are not doing 11:17:32